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## ROBERT L. BROWN III

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MAR 16 2009

**PUBLIC SERVICE** COMMISSION

### FACSIMILE LETTER

TO:

Public Service Commission

FACSIMILE #:

(502) 564-3460

FROM:

Robert L. Brown III

DATE:

March 16, 2009

TIME:

2:15 pm

RE:

CASE NO. 2009-00080

MESSAGE:

Please see the attached. Hard copies will follow in the mail.

#### REFERENCE #:

The information contained in this facsimile is confidential and may also be attorney -privileged. The information is intended only for the use of the individual or entity to whom it is addressed. If you have received this facsimile in error, please immediately notify us by a collect telephone call to (606) 528-3073 and return the original message to us at the address above by United States mail. Thank you .

ROBERT L. BROWN III

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CORBIN, KENTUCKY 40701

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PUBLIC SERVICE COMMISSION

Public Service Commission Mr. Jeff R. Derouen Executive Director 211 Sower Blvd. P.O. Box 615 Frankfort, KY 40602

RE: CASE NO. 2009-00080

Dear Mr. Derouen:

Enclosed please find an original and ten copies of a Motion for an Extension of Time as it relates to the above-mentioned matter.

Thank you for your assistance in this matter, and should you have any questions, please do not hesitate to contact me.

Sincerely,

Robert L. Brown III

RLB/ca

Enclosures

# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PURCHASED GAS ADJUSTMENT FILING OF CITIPOWER, LLC

CASE NO. 2009-00080

### MOTION FOR AN EXTENSION OF TIME

Comes the now the undersigned attorney, Robert L. Brown III, and enters his appearance herein, and hereby respectfully requests an extension of time to address the issues raised in the Public Service Commission Staff's Initial Data Request of Commission Staff to Citipower, LLC, (the "Utility"). The Utility is working diligently to respond to the Initial Data Request of the Commission (dated March 3, 2009), however, due to the nature of the questions, the need to obtain information from third parties, and current time restraints of the Utility Staff, the Utility respectfully requests an additional ten (10) days from the date of this Motion to file responses to the initial request for information.

Respectfully Submitted,

Robert L. Brown III

1005 South Main Street, Suite 101

Corbin, Kentucky 40701 Telephone: (606) 528-3073

### **CERTIFICATE OF SERVICE:**

l hereby certify that the foregoing Motion was served by faxing a copy and by and mailing the original and ten copies thereof, postage prepaid, this <u>14</u> day of March, 2009, to the following:

Mr. Jeff Derouen Executive Director Public Service Commission 211 Sower Blvd. P.O. Box 615 Frankfort, KY 40602

Hon. Jack Conway Attorney General 1024 Capital Center Drive Suite 200 Frankfort, Kentucky 40602

Robert L. Brown III